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OF COUNSEL

March 31, 2016

NML Capital, Ltd. v. Republic of Argentina, No. 08 Civ. 6978 (TPG); Seijas v. Republic of Argentina, No. 04 Civ. 400 (TPG); and related cases

Dear Judge Griesa:

We represent the Republic of Argentina (the "Republic") in the above-referenced cases. After conferring regarding the schedule in these cases, the Republic and the Class Plaintiffs who have moved to intervene and for a preliminary injunction jointly request that all filing deadlines and hearing dates in these cases be stayed pending a decision by the Court of Appeals in Aurelius Capital Master, Ltd. v. Republic of Argentina, No. 16-0628. The responses to Class Plaintiffs' motions are currently due April 1, 2016 and April 4, 2016, and an evidentiary hearing currently is scheduled for April 26, 2016. The parties propose that they confer within seven days of the disposition of the appeal to negotiate a proposed schedule to complete briefing on the motions and for pre-hearing exchanges and the evidentiary hearing.

The parties request these extensions because the decision by the Court of Appeals may affect this Court's resolution of these matters and the potential for settlement.

APPROVED

¹ The moving Class Plaintiffs are the plaintiffs in Case Nos. 04 Civ. 400 (TPG), 04 Civ. 401 (TPG), 04 Civ. 506 (TPG), 04 Civ. 936 (TPG), 04 Civ. 937 (TPG), 04 Civ. 1085 (TPG), 04 Civ. 2117 (TPG), and 04 Civ. 2118 (TPG). The motions are found at 08 Civ. 6978 (TPG) Dkt. 883, 04 Civ. 400 (TPG) Dkt. 286, 04 Civ. 401 (TPG) Dkt. 185, 04 Civ. 506 (TPG) Dkt 182, 04 Civ. 936 (TPG) Dkt. 184, 04 Civ. 937 (TPG) Dkt. 182, 04 Civ. 1085 (TPG) Dkt. 182, 04 Civ. 2117 (TPG) Dkt. 181, and 04 Civ. 2118 (TPG) Dkt. 172.

This is the Republic's second request for an extension on the motions to intervene and for a preliminary injunction. The Republic's first request was granted.

Respectfully submitted,

/s/ Michael A. Paskin

Hon. Thomas P. Griesa
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

VIA ECF

Copies to all counsel by ECF

The evidentiary hearing will still take place on April 26, 2016, unless the court informs the parties otherwise.

USDC SDNY DOCUMENT

ELECTRONICALLY FILED

DOC #:

DATE FILED: 4/1/16

SO ORDERED:

4/1/16